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November 1, 2019

VIA FCC ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW
Washington, D.C. 20554

Re: In the Matter of Implementation of State and Local Governments Obligation to Approve Certain Wireless Facility Modification Requests Under Section 6409(a) of the Spectrum Act of 2012 (WT Docket No. 19-250; RM-11849); Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment (WT Docket No. 17-79); and Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment (WC Docket No. 17-84)

Dear Ms. Dortch:

Telecom Law Firm, PC and Kissinger & Fellman, P.C. represent a coalition of local governments consisting of City of San Diego, Cal.; City of Beaverton, Or.; City of Boulder, Colo.; Town of Breckenridge, Colo.; City of Carlsbad, Cal.; City of Cerritos, Cal.; Colorado Communications And Utility Alliance; City of Coronado, Cal.; Town of Danville, Cal.; City of Encinitas, Cal.; City of Glendora, Cal.; King County, Wash.; City of Lacey, Wash.; City of La Mesa, Cal.; City of Lawndale, Cal.; League of Oregon Cities; League of California Cities; City of Napa, Cal.; City of Olympia, Wash.; City of Oxnard, Cal.; City of Pleasanton, Cal.; City of Rancho Palos Verdes, Cal.; City of Richmond, Cal.; Town of San Anselmo, Cal.; City of San Marcos, Cal.; City of San Ramon, Cal.; City of Santa Cruz, Cal.; City of Santa Monica, Cal.; City of Solana Beach Cal.; City of South Lake Tahoe, Cal.; City of Tacoma, Wash.; City of Thousand Oaks, Cal.; Thurston County, Wash.; and City of Tumwater, Wash.; (collectively, the “Western Communities Coalition”). On October 29, 2019, the Western Communities Coalition, through the law office of Kissinger & Fellman, P.C., submitted Joint Comments (with Exhibits A through R) in the referenced proceeding via the FCC’s Electronic Comment Filing System (“ECFS”).

During the filing process, a series of technical difficulties arose with ECFS. The Western Communities Coalition’s Joint Comments (and Exhibits A through R) is a 16 MB PDF file, a document type and size limit that falls within the FCC’s ECFS filing parameters of “... (overall file(s) max size: 25 MB per submission) (max number of files 5)”. However, the single 16 MB document failed to upload even after multiple attempts were made to limit the filing size.

Ultimately, the Joint Comments (and Exhibits A through R) were dismantled and filed with the FCC in four (4) separate filing transactions as indicated below:

- ID: 103033880282 (Joint Comments with Exhibits A through E)
- ID: 1030001882496 (Exhibit F)
- ID: 1030783415087 (Exhibit G)
- ID: 1030635114516 (Exhibits H through R)

On October 30, 2019, Beth Ann Jackson, a paralegal with Kissinger & Fellman, P.C., contacted the ECFS Help Desk to confirm receipt of the filing and to determine if there was a way to “link” the transactions. Ms. Jackson was informed that the four (4) transactions were received and had been posted to the FCC’s e-filing system. However, ECFS does not offer an option to “link” transactions. Ms. Jackson was informed that filing the Joint Comments and Exhibits A through R in separate transactions was the proper way to submit the filing in light of the technical errors that were being encountered.

The purpose of this communication is to notify the FCC that the above referenced transactions are a single filing and the Western Communities Coalition requests that the documents within each of the four (4) transactions be reviewed in their entirety as a single filing (i.e. Joint Comments with Exhibits A through R).

Please feel free to contact undersigned counsel with any additional questions or concerns you may have.

Respectfully submitted,

s/ Robert C. May III

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s/ Kenneth S. Fellman

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County, Washington; and City of Tumwater, Washington.